
Appendix A

Public and Stakeholder Comments and Responses

INDOT 2030 Long Range Transportation Plan

Comments Received

During the development of the Indiana 2030 Long Range Transportation Plan, the Indiana DOT received several comments on the proposed plan. Below are responses to these comments provided as additional information to the Statewide planning process. For more detailed information about Public Comment, see Chapter 3, page 38.

Operations & Maintenance Costs

Operations & maintenance costs for the preservation of the current transportation system are to be addressed in long range transportation. This is to ensure adequate revenues are provided for the preservation of existing system needs. One comment received asked for additional clarification of how this was provided for in the State's long range transportation plan.

Response: The 2007 Update of the 2030 Long Range Transportation Plan addresses the costs for preservation by first projecting future revenues, and then setting aside the costs estimated to be needed for preservation.

In the fiscal forecast chapter of the Plan, we begin our forecast period with INDOT's entire construction budget and then forecast the preservation and capital improvements future revenues separately. The preservation element is forecasted to increase at a 3% annually and is shown in Figure 11-2 and Table 11-6 (both on page 152), summarized into the five-year implementation periods. Thus, the cost for preservation is taken out of the long range planning process at the very beginning to help meet the requirement that preservation be funded first. Also, for the first time, the 2007 Update presents an analysis of actual operating and maintenance cost by District and estimated for each MPO on page 153.

The long range plan then focuses on added capacity projects and does not attempt to get into preservation projects. In earlier transportation plan updates the presentation of selected reconstruction projects were removed from plan maps due to the confusion this created that left the public with an impression that reconstruction projects were part of the adopted long range plan. This is not the case. Only expansion projects are included, and only these are funded by the revenues estimated to be available after preservation funding has been set aside. As shown in the investment levels for the forecasts of the preservation and capital future funds, preservation of the existing system remains the first priority.

Operations & Maintenance is also emphasized in the planning factor discussion in Chapter 2 for item 8 "Emphasize the preservation of the existing transportation system" and item 7 "Promote efficient system management and operation".

Environmental Mitigation

Recent changes in federal regulation require Statewide and metropolitan long range transportation plans must include a generalized discussion of potential mitigation activities (at the policy/strategy-level, not project-specific). One comment received asked for additional clarification as to how this was provided for in the Plan.

Response: To meet this requirement, INDOT frequently meets with resource agencies as specific projects are being developed. For the Major Moves program of projects, INDOT along with FHWA and various

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State resource agencies meet to discuss these projects. In addition, coordination with resource agencies is well documented in INDOT's environmental procedures manuals.

INDOT will also be meeting with various State resource agencies by the end of June 2007 to discuss additional steps that may be appropriate. When conservation plans, maps and inventories are available, these will be compared with any new alignment roads so that appropriate consideration can be given to making a decision that is both environmentally responsible and helps provide for safe transportation across Indiana.

In addition, INDOT is evaluating how best to incorporate constructive environmental goals and objectives into its long range planning documents. INDOT will continue to work the resource agencies mentioned above to develop these goals and objectives for further consideration as the next long range plan is developed.

Revenue & Inflation Rate Projections

A comment was received about how the rate of increase for State and federal revenues was developed, and how the rate of inflation was calculated.

These projections for each of the revenue and inflation rates were prepared by the Finance Section of the Indiana DOT. They used the following assumptions:

- State Highway Revenues were projected to increase at one-percent per year out to 2030. This assumption is based upon trend analysis of past revenues and the analysis of state revenue programs and related legislative proposals as carried out by the INDOT fiscal section.
- Federal Highway Revenues were projected to increase at six-percent per year out to 2030. This assumption is based upon trend analysis of past federal revenues, the analysis of federal revenue programs and related congressional proposals as carried out by the INDOT fiscal section. Past historical funding trends have been influenced by Indiana's role as a donor state. A donor state pays more federal taxes to the Highway Trust Fund than it receives back. Before the passage of TEA-21, Indiana received only 78 percent back into the state from its share of contributions to the Federal Highway Trust Fund to use for highway maintenance and construction. The Federal Highway Trust Fund is the primary source of funds for federal surface transportation programs. The Federal Highway Trust Fund is a user supported fund that collects revenues in the form of federal taxes paid on gasoline, diesel fuel, gasohol, special fuels such as liquefied natural gas (LNG) and compressed natural gas, and heavy vehicle use fees for commercial vehicles. In the passage of TEA-21, Indiana was able to increase its guaranteed rate of return from the Trust Fund to 90.5 percent. This provided a significant increase in federal funding
- An inflation rate was developed to estimate a project's cost at the year of construction. In order to make this estimation, a trend analysis was conducted of the inflation in construction related industries. Over the past several years, high construction costs increases were experienced in steel prices, concrete, petrochemical products, and other construction related materials. To account for these high cost increases, an inflation factor for the 2002 to 2007 time frame of 7.2% per year was applied to bring project costs up to date. For the long range forecast, a lower rate was assumed to be more in-line with longer term construction cost increases. The analysis of past trends indicated that an inflation cost of 3.5 % per year would provide a reasonable rate for future cost increases.

Although there will be fluctuations in these rates over time, these estimates provide a reasonable basis for the State to identify and prioritize its statewide transportation needs for the purposes of this long range plan.

Schedule for updating the State's long range transportation plan

Federal requirements state that a State shall continually evaluate, revise, and periodically update the long range statewide transportation plan, as appropriate, using the procedures in this section for development and establishment of the long range statewide transportation plan. A comment received asked for further clarification as to what INDOT's schedule for updating its long range transportation plan.

Response: INDOT has continually evaluated, revised and periodically updated its statewide long range transportation plan since its first adoption in 2002. In 2003 the plan was amended and in 2004 the plan was updated in the extension of its planning horizon year from 2025 to 2030.

It is anticipated that the statewide plan will be revised in FY 2008 to address changes in project priority and timing, and the coordination process with our planning partners in the metropolitan and regional areas across Indiana. These will take the form of amendments to the statewide plan, when it is appropriate.

Finally, the transportation plan will need to be updated prior to 2010 to maintain a 20-year horizon period of the plan to 2035, which is required by federal regulation.

Technical Corrections

July 18, 2007 Technical Correction

A set of corrections were made to the plan including map and project listing corrections for a project inadvertently not shown in the initial printing of the long-range plan documents, reformatted pages in the project listing section resulting from page renumbering and map placement and a revised table of contents.

The project for the US52 Brookville Rd project (Des # 9704160 LRP ID # 472) was inadvertently not shown on the Greenfield of Indianapolis MPO project maps or project listings. This project was in the 2004 update of the long-range plan and it is in the Major Moves program as shown on the INDOT website. It was included in the fiscal analysis for the statewide plan development; it is in the Indianapolis MPO long range plan (per the recommendation of INDOT) and is included in the conformity analysis for the Indianapolis MPO. The project was placed on hold temporarily in the scheduling system and therefore did not show up as an "active" project at the time the maps and project tables were prepared.

The error was discovered, however the corrections were not made to the June printing of the long-range plan which was approved by the Commissioner and sent to FHWA on June 28, 2007. The corrected maps and project listings were included with the other items in the July 18, 2007 technical corrections and sent to FHWA. In consultation with FHWA it was determined that due to the projects inclusion in the Major Moves program, the Indianapolis MPO's Transportation Plan and its analysis in the FHWA approved air quality conformity analysis, the correction is a "technical correction" and does not require any formal approval action. The corrections have been made to all distributed copies and the electronic version on the INDOT website.

August 28, 2007 Technical Correction

A second set of corrections have been made to the plan including project listing corrections for projects inadvertently not shown in the final printing of the long-range plan documents, and projects that were listed in the incorrect funding periods. These projects are considered technical corrections due to the extensive public involvement activities undertaken on them and their analysis relative to meeting financial constraint and air quality conformity (where applicable). These technical corrections also include the reformatted pages in the project listing section, including maps, if necessary.

Projects that were not listed in the final printing (June 2007) of the 2007 Update:

- The project for US231 New Road Construction from SR 26 to US 52 in Tippecanoe County (Des # 0300431) was unintentionally not listed in the final project listing for Crawfordsville District and the Lafayette MPO. This Major Moves project has two phases in the 2006 – 2010 Funding Period. The Lafayette MPO includes this project in their Transportation Plan. The Lafayette MPO is not required to perform air quality conformity as they are in attainment of air quality standards
- The project for I-65 Added Travel Lanes from 0.5 mile North of SR 334 to US 52 in Boone County (Des # 0200904) was unintentionally not listed in the final project listing for Crawfordsville District and the Indianapolis MPO. This Major Moves project has three phases in the 2011 – 2015 Funding Period. The Indianapolis MPO includes this project in their Transportation Plan. This project was also included in the Indianapolis air quality conformity analysis.

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Projects that were listed in the incorrect Funding frame include the following:

- I-465 at W. 38th St., Des # 9829610; and I-465 at US 36, Des # 9829410 are both Interchange Modernization projects included in the I-465 West Leg Improvements. These two Major Moves projects were inadvertently listed in 2011 – 2015 Funding Period, but should have been shown in the 2006 – 2010 Funding Period. All of the Major Moves I-465 West-Leg Improvements are scheduled to begin in the 2006 – 2010 Funding Period. This project was also included in the Indianapolis air quality conformity analysis.
- I-465, Added Travel Lanes from 0.5 miles N of 46th Street to 0.3 miles N of I-65, Des # 0200003, was inadvertently listed in the 2006 – 2010 Funding Period, but should have been shown in the 2016 – 2020 period, as it is not a Major Moves funded project and is scheduled for the 2016 – 2020 funding period. This project was also included in the Indianapolis air quality conformity analysis.
- Similarly, I-465, Added Travel Lanes from 0.5 miles N of 86th Street to US 421, Des # 0400881, was inadvertently listed in the 2011 – 2015 Funding Period, but should have been listed in the 2016 – 2020, as it is not a Major Moves funded project, but is scheduled for funding in the latter funding period. This project was also included in the Indianapolis air quality conformity analysis.

These five projects were listed in the 2004 update of the long-range plan; were listed in the January 2007 project listings distributed to District and MPOs; and, except for the I-465 Added Lanes Projects, are listed in the Major Moves program as shown on the INDOT website. These projects were all included in the fiscal analysis for the statewide plan development; and are in the respective MPO long range plans. The I-65 and I-465 projects have been included in the conformity analysis for the Indianapolis MPO; the Lafayette MPO is not required to perform air quality conformity as they are in attainment of air quality standards.

In addition, one median construction project was mistakenly shown as Added Travel Lanes project. Because the 2007 LRP Update does not include Median Construction projects, this project should be deleted from the Plan:

- SR 67 from US 35/SR3 to S jct of SR 29, Des # 9901680 (Greenfield District, Muncie MPO). Updated maps for the Greenfield District and Muncie MPO will be provided.

To conclude, these errors were discovered after the June printing of the long-range plan which was approved by the INDOT Commissioner and sent to FHWA on June 28, 2007. In consultation with FHWA it was determined that due to the projects' inclusion in the 2004 Update, the Major Moves program (except the I-465 Added Lanes projects), the Indianapolis MPO's Transportation Plan and the FHWA approved air quality conformity analysis, and the Lafayette MPO's Transportation Plan, the correction is a "technical correction" and does not require any formal approval action. The corrections have been made to all distributed copies and the electronic version on the INDOT website.